

2022-02-16 Meeting with CAMLOs and RCMP

February 16, 2022 4:00 PM

Meeting Date: 2022-02-16 4:00 PM

Location: Microsoft Teams Meeting Dial-In: (647) 749-9252 | Phone Conference ID: 614 300 245#

Link to Outlook Item: [click here](#)

Invitation Message

Participants

-  [Personal Info. \(AML\)](#) (Meeting Organizer)
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-  [Chaves, Francisco](#)
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-  [Beaudoin, Denis](#)

Notes

Personal thought that it would be good to coordinate with all other banks to have a common understanding of the EMA and to deconflict with CBA.

Banks acknowledge the receipt of the designated persons.

Banks wanted to know what the designated persons.

The second disclosure would be of people that have been observed in the protest.

The first disclosures were provided by the OPP/OPS which are the SOI in the criminal case.

Banks asked about cadence: Denis mentioned that the current list is of about 65 vehicles and people that is being processed at this moment. Disclosure will be batched up to avoid individual disclosures.

The banks welcome the central coordination and working through the existing channels. The banks like that the RCMP works as a clearance house.

Denis mentioned that at this time Ottawa remains the only pressure point in the country. So disclosures center around Ottawa.

The Act does not include municipal partners, and perhaps the OPP and another provincial partner.

Banks accept informing the RCMP about the bank's unilateral actions and other requests they obtain outside of the RCMP. This feedback mechanism will also provide indications that the legislation works.

CIBC has 5 individuals with holdings, actions to come. Regarding the freezing - banks wondered if the banks are the ones to freeze or not. Denis confirmed that the freezing is on the banks and not up to the police to provide an order before the banks take the actions.

Banks recognized that their actions could have direct implications on the ground. Banks wondered how to act. Denis

indicated that the banks proactive actions are beneficial even if the police have not provided information.

Banks asked about thresholds to act - low frequency transaction accounts or it is everything. Denis refer them to consult with their legal units.

The banks will leverage the list provided by the RCMP and ingest. Upon reviewing their own holdings, the banks need to asses if those people meet the definition of a designated person before moving to freeze.

If the banks don't see any activity as to link those individuals to the convoy, then the bank may simply report the individual to the RCMP without acting the Order. As such time, the RCMP may provide further information to the banks.

The law is active as the of the time of it's passing. It is not retroactive.

Banks asked whether there will be 'removal list' how would the banks know when to remove a person from the list. Denis could not answer how to proceed with the removal of names.

BMO and CIBC are looking to put people on the **do not bank** list.

Banks are worried what to tell their clients. Your name is on a public list? How can the bank support their actions. Would there be a number where the customers can be referred to attest that they are not a concern any more?

Banks indicated that freezes don't come on quickly and don't come off quickly.

If the banks cut of people, they may be put on a situation that they won't event be able to move the trucks. So how can the banks be made aware that people can have money to move from the site?

Can the banks share the list with other institutions that deal with the bank in order to make them aware of the compliance. Denis indicated that the document is not public.

Insurance provider question came up. Insurance provider revokes coverage but police ask them to drive away.

Regarding outrageous individuals that are not on the list provided by the police, the law allows the banks to move into those individuals and to report it to the RCMP.

The primary objective is to make them uncomfortable to make them move back home, however if the banks get into a big investigation it may affect people that are not tied to the protest or even exacerbate the situation on the ground.

Some banks realize that start freezing account could really fuel the situation, so they would feel better consulting with LE before acting on the accounts. This specifically for people the banks identified them selves.

Kelly Hughes will be the main point of contact. Banks would like to have a phone call instead of emailing names due to security reasons.

Disclosing of financial information, the banks will disclose information regarding the convoy is not about all financial products held by the protestors.

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